

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES, *et al.*,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, *et al.*,

*Defendants.*

Civ. No. 1:16-cv-00563 (LO/TCB)

**MEMORANDUM IN SUPPORT OF  
PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) submit this memorandum in support of their Motion to File Documents under Seal. Plaintiffs request permission to file under seal Exhibits 1, 2, 3, and 4 to Plaintiffs’ Reply Memorandum in Support of Motion *in Limine*. The exhibits consist of documents Defendants designated confidential pursuant to the Protective Order (Dkt. 45).

First, Exhibits 1-3 contain excerpts from Defendants’ deposition testimony, which Defendants designated confidential pursuant to the Protective Order and previously filed under seal. *See* Dkt. 146. Second, Exhibit 4 is a document that is subject to the Protective Order, as confidential communications between the parties regarding Plaintiff’s lease agreement.

*Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000), held that documents may be sealed pursuant to district court order when the court: (1) provides notice to the public and gives

it an opportunity to object to sealing, (2) considers less drastic alternatives, and (3) provides specific findings in support of the decision to seal and the rejection of alternatives. Those requirements are met here.

First, Plaintiffs have concurrently filed a Notice of Motion to be docketed by the Clerk. The Notice will provide the public with an opportunity to object to the sealing of the documents in question.

Second, no feasible alternative exists to sealing these documents, in light of the Protective Order requiring information designated confidential pursuant to the Order to be filed with the Court consistent with Local Rule 5 of the Eastern District of Virginia. Accordingly, the utmost discretion and confidentiality is necessary, and filings in this action should be kept under seal.

For these reasons, Plaintiffs respectfully request that the Court grant Plaintiffs' Motion to File Document under Seal. A proposed order is attached.

[signatures on following page]

Respectfully submitted,

Date: June 28, 2021

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//s// \_\_\_\_\_  
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**Certificate of Service**

I hereby certify that on this 28th day of June, 2021, I caused the foregoing, along with all attachments thereto, to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

//s//  
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